

EXHIBIT 3

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

In re: NEXIUM (ESOMEPRAZOLE)
ANTITRUST LITIGATION

Civil Action No. 12-md-02409-WGY

This Document Relates To:

**NOTICE OF PENDENCY OF
CLASS ACTION**

DIRECT PURCHASER CLASS ACTION

Hon. William G. Young

**If you purchased Nexium directly from
AstraZeneca in the United States, a class action
lawsuit may affect your rights.**

*This Notice is being provided by Order of the U.S. District Court.
It is not a solicitation from a lawyer. You are not being sued.*

American Sales Company, LLC, Meijer, Inc., Meijer Distribution, Inc., Rochester Drug Co-Operative, Inc., Value Drug Company, and Burlington Drug Co. Inc. ("plaintiffs") sued AstraZeneca AB, Aktiebolaget Hassle, AstraZeneca LP (collectively, "AstraZeneca"), Ranbaxy Pharmaceuticals, Inc., Ranbaxy Inc., and Ranbaxy Laboratories Ltd. (collectively, "Ranbaxy"), Teva Pharmaceutical Industries, Ltd., Teva Pharmaceuticals USA, Inc. (collectively, "Teva"), Dr. Reddy's Laboratories Ltd., and Dr. Reddy's Laboratories, Inc. (collectively, "Dr. Reddy's") (all together, "defendants"), alleging that defendants violated federal antitrust laws by wrongfully delaying the introduction of generic versions of the prescription drug Nexium (delayed-release esomeprazole magnesium) into the United States market. Plaintiffs allege AstraZeneca monopolized the market for delayed-release esomeprazole magnesium by entering into illegal market allocation conspiracies with, between, and among three generic manufacturers and potential competitors – Ranbaxy, Teva, and Dr. Reddy's – that were disguised as patent litigation settlements, but were in reality payoffs by AstraZeneca to keep the generic drug makers, and potential competitors, off the market. The lawsuit claims these actions injured plaintiffs and members of a class of direct purchasers of Nexium by causing them to pay higher prices for Nexium (delayed-release esomeprazole magnesium). Defendants deny these claims and deny that they did anything wrong.

On December 11, 2013, a federal court allowed this antitrust lawsuit to proceed as a class action, and certified the following class:

All persons or entities in the United States, including U.S. territories, who purchased branded Nexium directly from AstraZeneca at any time during the period August 27, 2008 through December 11, 2013 (the "Class"). Excluded from the Class are the Defendants, their officers, directors, management, employees, subsidiaries, and affiliates, and all federal governmental entities.

**YOUR LEGAL RIGHTS WILL BE AFFECTED
WHETHER YOU ACT OR NOT.
PLEASE READ THIS NOTICE CAREFULLY.**

YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT	
Do Nothing	By doing nothing, you remain in the class and may be entitled to share in any recovery that may come from a trial or settlement with defendants. All of the Court's orders will apply to you and legally bind you.
Ask To Be Excluded	This is the only option that allows you to file or be part of another lawsuit against defendants AstraZeneca, Ranbaxy, Teva, and Dr. Reddy's relating to the claims in this case. If you exclude yourself from the class, you will not be bound by any of the Court's orders in this case, nor will you be entitled to participate in and benefit from any recovery in this case.

**THESE RIGHTS AND OPTIONS
– AND THE DEADLINES TO EXERCISE THEM –
ARE EXPLAINED IN THIS NOTICE.**

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BASIC INFORMATION

1. *Why did I receive this notice?*

The records of AstraZeneca indicate that you purchased Nexium directly from AstraZeneca from August 27, 2008 through December 11, 2013. This notice explains that the Court has allowed, or “certified,” a class action lawsuit that may affect you. You have legal rights and options that you may exercise. Judge William G. Young of the United States District Court for the District of Massachusetts is overseeing this class action. The lawsuit is known as *In re Nexium (Esomeprazole) Antitrust Litigation*, Civil Action No. 12-md-02409-WGY (D. Mass.).

2. *What is the lawsuit about?*

The lawsuit claims that AstraZeneca violated federal antitrust laws by unlawfully delaying the introduction of generic versions of the prescription drug Nexium into the United States market, causing injury to plaintiffs and members of the class by causing them to pay higher prices for Nexium. The lawsuit claims that, among other things, brand drug maker AstraZeneca orchestrated a series of anticompetitive agreements with its generic competitors, Ranbaxy, Teva, and Dr. Reddy’s, to delay generic competition for Nexium. Plaintiffs allege that, to preserve its monopoly, and despite the weakness of its Nexium patents, AstraZeneca filed patent infringement suits to block generic competitors from selling Ranbaxy, Teva, and Dr. Reddy’s less expensive, but chemically identical, generic versions of Nexium. Although Ranbaxy, Teva, and Dr. Reddy’s had strong defenses to these actions, instead of defending the patent infringement actions and fighting to launch generic Nexium as early as possible, they instead to share in AstraZeneca’s monopoly profits in exchange for staying off the market. Plaintiffs allege that defendants’ scheme has blocked generic esomeprazole from the market to this day, depriving direct purchasers of the predictable and significant price benefits of generic competition. Defendants deny these claims and denies that they did anything wrong. Defendants dispute that the agreements were anticompetitive. Defendants also deny that the challenged agreements delayed the entry of generic versions of Nexium.

There has been no determination by the Court or a jury that the allegations against and defendants AstraZeneca, Ranbaxy, Teva, and Dr. Reddy’s have been proven.

3. *What is a class action?*

In a class action lawsuit, one or more persons or entities (called “plaintiffs” or “class representatives”) sues on behalf of others who have similar claims. Together, they are typically called a “class” or “class members.” Accordingly, companies that purchased Nexium directly from AstraZeneca during the relevant time period are considered part of a “class” or “class members.” The companies that sued are called the plaintiffs (or class representatives). The companies it sued, in this case AstraZeneca, Ranbaxy, Teva, and Dr. Reddy’s, are called defendants. One court resolves the issues for everyone in the class – except for those who choose to exclude themselves from the class.

4. *Why is this a class action?*

The Court decided that this lawsuit can proceed as a class action because it meets the requirements of Federal Rule of Civil Procedure 23, which governs class actions in federal courts. Specifically, the Court found that:

- The class is so numerous and geographically dispersed and the matter sufficiently complex such that joinder of all members is impracticable;
- There are factual or legal questions that are common to the members of the class;
- The claims of the class representatives are typical of the claims of the class they represent;
- The class representatives, and the lawyers representing the class, will fairly and adequately represent the interests of the members of the class;
- The common facts or legal questions predominate over any questions that may affect only individual members of the class; and
- This class action will be more efficient than having many individual lawsuits.

THE CLAIMS IN THE LAWSUIT

5. *Has the Court decided who is right?*

The Court has not decided in favor of plaintiffs or defendants. By issuing this notice, the Court is not suggesting that plaintiffs will win or lose this case. If the claims against defendants are not resolved by a settlement or otherwise, plaintiffs must prove their claims at trial. A jury trial date has been set by the Court for March 3, 2014.

6. *What are plaintiffs asking for?*

Plaintiffs are seeking to recover the overcharges that it claims resulted from defendants' anticompetitive conduct. If plaintiffs prevail at trial, they will be entitled to ask that the Court triple the amount of damages that the plaintiffs are able to prove. Plaintiffs also seek attorneys' fees and litigation costs.

7. *Is there any money available now?*

No money or benefits are available now because the Court has not yet decided whether defendants did anything wrong, and the two sides have not settled the case. There is no guarantee that money or benefits will ever be obtained. If they are, you will be notified regarding how to obtain a share.

WHO IS IN THE CLASS

You need to decide whether you are affected by this lawsuit.

8. *Am I a part of this case?*

On December 11, 2013, a federal court allowed this antitrust lawsuit to proceed as a class action, and certified the following class:

All persons or entities in the United States, including U.S. territories, who purchased branded Nexium directly from AstraZeneca at any time during the period August 27, 2008 through December 11, 2013 (the "Class"). Excluded from the Class are the Defendants, their officers, directors, management, employees, subsidiaries, and affiliates, and all federal governmental entities.

If you fit within the definition of the class, you will be considered a member of the class unless you timely and fully comply with the instructions for excluding yourself from the class as set forth below.

YOUR RIGHTS AND OPTIONS

You have to decide whether to stay in the class or ask to be excluded before the trial, and you have to decide this now.

IF YOU DO NOTHING

9. *What happens if I do nothing at all?*

If you do nothing, you will remain in the class. You will keep the right to a share of any recovery that may come from a trial or settlement in this litigation. You will not be able to start your own lawsuit against any of defendants AstraZeneca, Ranbaxy, Teva, and Dr. Reddy's about the legal issues in this case. All of the Court's orders will apply to you and legally bind you.

EXCLUDING YOURSELF FROM THE CLASS

10. *Why would I ask to be excluded?*

If you exclude yourself from the class – also known as "opting-out" of the class – you won't get any money or benefits from this lawsuit even if plaintiffs obtain them as a result of trial or from any settlement between

defendants AstraZeneca, Ranbaxy, Teva, and Dr. Reddy's and plaintiffs. If you exclude yourself, you will not be legally bound by any of the Court's orders in this class action or any judgment or release entered in this class action.

11. *How do I ask the Court to exclude me from the class?*

You can exclude yourself from the class by sending a written "Request for Exclusion" to the Notice Administrator no later than _____, 30 days after this notice was mailed. You cannot exclude yourself by a telephone call or by sending an email. Your written request should include:

- Your name, address, telephone number, and the statement that you want to exclude yourself from the class, and
- The case name and number: *In re Nexium (Esomeprazole) Antitrust Litigation*, Civil Action No. 12-md-02409-WGY (D. Mass.).

Exclusion Requests must be sent to the following address:

Rust Consulting, Inc.
P.O Box XXXX
Faribault MN 55021-XXXX

THE LAWYERS REPRESENTING YOU

12. *Do I have a lawyer in this case?*

The Court appointed several law firms to serve as counsel to represent you and all class members. Their contact information is as follows:

Thomas M. Sobol
David S. Nalven
Donna Evans
Kristen Johnson Parker
HAGENS BERMAN SOBOL
SHAPIRO LLP
55 Cambridge Parkway, Suite 301
Cambridge, MA 02142
Tel: (617) 482-3700
Fax: (617) 482-3003

David F. Sorensen
Daniel C. Simons
Caitlin G. Coslett
Nicholas Urban
BERGER & MONTAGUE, P.C.
1622 Locust Street
Philadelphia, PA 19103
Tel: (215) 875-3000
Fax: (215) 875-4604

Bruce E. Gerstein
Joseph Opper
Elena Chan
Ephraim R. Gerstein
GARWIN GERSTEIN & FISHER LLP
1501 Broadway, Suite 1416
New York, NY 10036
Tel: (212) 398-0055
Fax: (212) 764-6620

Lead Counsel for Direct Purchaser Plaintiffs

13. *Should I get my own lawyer?*

You do not need to hire your own lawyer if you remain in the Class because the lawyers appointed by the Court are working on your behalf. You may hire a lawyer and enter an appearance through your lawyer at your own expense if you so desire.

14. How will the lawyers be paid?

If class counsel achieves a recovery for the class, the Court will be asked to approve reasonable fees and expenses for the lawyers who worked on the case and reimbursement for the litigation expenses they have advanced on behalf of the class. If the Court grants class counsel's requests, fees and expenses would either be deducted from any money obtained for the class or paid separately by defendants. Members of the class will not have to pay any attorneys' fees or expenses.

THE TRIAL

15. How and when will the Court decide who is right?

If the claims against defendants are not resolved by a settlement or otherwise, class counsel will have to prove plaintiffs' claims at trial. A jury trial is scheduled for March 3, 2014. During the trial, a jury will hear all of the evidence about whether plaintiffs or defendants are right about the claims in the lawsuit. There is no guarantee that plaintiffs will win, or that it will get any money for the class. Any judgment will be binding on all class members who have not opted out, regardless of who wins.

16. Do I have to come to the trial?

You do not need to attend the trial. Class counsel will present the case for plaintiffs and the class, and counsel for defendants AstraZeneca, Ranbaxy, Teva, and Dr. Reddy's, will present the defenses. You and/or your own lawyer are welcome to attend the trial at your own expense.

17. Will I get money after the trial?

If plaintiffs obtain money or benefits as a result of the trial or a settlement, you will be notified about how to participate. We do not know how long this will take.

GETTING MORE INFORMATION

18. Are more details available?

For more detailed information about this litigation, please refer to the papers on file in this litigation, which may be inspected at the Office of the Clerk, United States District Court for the District of Massachusetts, United States Courthouse, 1 Courthouse Way, Boston, Massachusetts 02210 during regular business hours of each business day. You may also get additional information by calling or writing to class counsel as indicated above.

PLEASE DO NOT CONTACT THE CLERK OF THE COURT OR THE JUDGE REGARDING THIS NOTICE. INSTEAD, PLEASE DIRECT ANY INQUIRIES TO ANY OF THE CLASS COUNSEL LISTED ABOVE.

Dated: XXXXXXXX XX, XXXX

BY THE COURT

Hon. William G. Young
UNITED STATES DISTRICT JUDGE